

EXHIBIT “A”

Danielle J. Walcott, Esquire #024451997
 1301 South Main Street
 Pleasantville, NJ 08232
 (609) 645-9400
 Attorneys for Plaintiff Alicia Lanuza

ALICIA LANUZA,

Plaintiff(s)

vs.

TIMOTHY M. KEYS;
 TRANSPORTATION INCORPORATED;
 J.B. HUNT TRANSPORT, INC.;
 J.B. HUNT TRANSPORT, INCORPORATED,
 J.B. HUNT TRANSPORT SERVICES, INC.
 JOHN DOES (1-10);
 JOHN DOE OWNER; JOHN DOES (1-10);
 ABC CORPORATIONS; XYZ
 PARTNERSHIPS; *Multiple, Fictitious
 Persons and Entities; Jointly, Severally and
 in the Alternative*

Defendant(s)

: SUPERIOR COURT OF NEW JERSEY
 : LAW DIVISION / ATLANTIC COUNTY
 : *Civil Action*

: DOCKET NO: ATL-L-4221-20

: **Summons**

From The State of NJ To The Defendant Named Above: **J.B. HUNT TRANSPORT SERVICES, INC.**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf.

Dated: 12-28-20

/s/ Michelle M. Smith

Michelle M. Smith, Clerk of the Superior Court

Name of Defendant to be served:

J.B. HUNT TRANSPORT SERVICES, INC.

Address for Service:

19 Edgeboro Rd., East Brunswick, NJ 08816

LIPARI & WALCOFF, LLC
Danielle J. Walcoff, Esquire #024451997
1301 South Main Street
Pleasantville, NJ 08232
(609) 645-9400
Attorneys for Plaintiff Alicia Lanuza

ALICIA LANUZA,

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vs.

TIMOTHY M. KEYS;
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J.B. HUNT TRANSPORT, INC.;
J.B. HUNT TRANSPORT, INCORPORATED;
J.B. HUNT TRANSPORT SERVICES, INC.
JOHN DOES (1-10);
ABC CORPORATIONS (1-10);
XYZ PARTNERSHIPS (1-10);
Multiple, Fictitious Persons and Entities;
jointly, severally and in the alternative,

Defendant(s).

: SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION /OCEAN COUNTY
: *Civil Action*

: DOCKET NO: ATL-L-

: COMPLAINT, JURY DEMAND AND
: DESIGNATION OF TRIAL COUNSEL

Plaintiff Alicia Lanuza residing at 207 Fisler Avenue, in the Egg Harbor Township,
County of Atlantic, in the State of New Jersey, by way of Complaint against the defendant(s),
says:

FIRST COUNT

1. On or about January 9, 2019, Plaintiff Alicia Lanuza was the operator of a vehicle that was traveling on Atlantic Avenue in Atlantic City, Atlantic County, New Jersey.
2. At the aforesaid time and place, Timothy M. Keys was operating a motor vehicle owned by Defendants Transportation Incorporated and/or J.B. Hunt Transport, Inc. and/or J. B. Hunt Transport, Incorporated and/or J.B. Hunt Transport Services, Inc., which was also traveling on Atlantic Avenue in Atlantic City, Atlantic County, New Jersey.

3. A collision occurred between the Plaintiff Alicia Lanuza's motor vehicle and the motor vehicle operated by Defendant Timothy M. Keys.

4. Defendant Timothy M. Keys so negligently and carelessly operated his motor vehicle so as to cause the collision.

5. Plaintiff alleges that an insufficient amount of time has passed within which to determine the identity of any other persons or business entities who may be responsible for the causation of the accident. Said persons and business entities have been named as John Does (1-10), ABC Corporations(1-10) and XYZ Partnerships (1-10). Plaintiff reserves the right to amend the Complaint when and if their identities become known.

6. The aforesaid accident was caused by the negligence of the defendants in the ownership, operation and control of the motor vehicle.

7. As a direct and proximate result of the aforesaid negligence of the defendants, Plaintiff Alicia Lanuza was caused to suffer severe and permanent bodily injuries requiring medical treatment, was caused pain and suffering, has incurred and will incur expenses for treatment of said injuries which comply with the Statutes of the State of New Jersey, has been and will be prevented from pursuing usual activities and has permanent disabilities that will affect plaintiff.

WHEREFORE, Plaintiff Alicia Lanuza, demands judgment against the defendants for damages together with costs of suit and interest.

SECOND COUNT

1. Plaintiff repeats the allegations of the First Count in their entirety and incorporates same as if set forth at length herein.

2. At the aforesaid time and place, Defendants Transportation Incorporated and/or J.B. Hunt Transport, Inc. and/or J.B. Hunt Transport, Incorporated and/or J.B. Hunt Transport Services, Inc., was the owner of the motor vehicle which was operated in a careless and negligent manner by Defendant Timothy M. Keys.

3. At all times relevant, Defendant Timothy M. Keys was operating said motor vehicle with the permission of, and/or as the agent, servant, and/or employee of Defendants Transportation Incorporated and/or J.B. Hunt Transport, Inc. and/or J.B. Hunt Transport, Incorporated and/or J.B. Hunt Transport Services, Inc.. As such, Defendants Transportation Incorporated and/or J.B. Hunt Transport, Inc. and/or J.B. Hunt Transport, Incorporated and/or J.B. Hunt Transport Services, Inc. is vicariously liable for the actions of Defendant Timothy M. Keys.


4. At all times relevant hereto, Defendant Transportation Incorporated and/or J.B. Hunt Transport, Inc. and/or J.B. Hunt Transport, Incorporated and/or J.B. Hunt Transport Services, Inc., negligently entrusted said vehicle to Defendant Timothy M. Keys.

WHEREFORE, Plaintiff Alicia Lanuza, hereby demands judgment against Defendants Transportation Incorporated and/or J.B. Hunt Transport, Inc. and/or J.B. Hunt Transport, Incorporated and/or J.B. Hunt Transport Services, Inc. for damages together with costs of suit and interest.

LIPARI & WALCOFF, LLC

Dated: December 28, 2020

By:


Danielle J. Walcott Esquire
Attorney for Plaintiff

DEMAND FOR JURY TRIAL

The plaintiff Alicia Lanuza hereby demands a trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

Pursuant to N.J.S.A. R. 4:25-4, DANIELLE J. WALCOFF, ESQUIRE, is hereby appointed as trial counsel.

DEMAND FOR COMPLIANCE WITH RULES 1:5-1(a) and 4:17-4(c)

TAKE NOTICE that the undersigned attorney for plaintiff, demands, pursuant to the provisions of Rules 1:5-1(a) and 4:17-4(c), that each party serving pleadings or interrogatories and receiving responses thereto shall serve copies of all such pleadings, interrogatories, and responses thereto upon the undersigned and further, this is a continuing demand.

CERTIFICATION PURSUANT TO RULE 4:5-1

I hereby certify that to my knowledge, the matter in controversy is not the subject of any other action pending in any court or of a pending arbitration proceeding. To my knowledge, no other action or arbitration procedure is contemplated. I have no knowledge at this time of the names of any other parties who should be joined in this lawsuit. I hereby certify that the foregoing statements made by me are true.

I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

DEMAND FOR ANSWER TO FORM C INTERROGATORIES

Plaintiff hereby demands that defendants answer Form C and/or C(1) (when applicable) Uniform Interrogatories as contained in Appendix II of the New Jersey Rules of Court in lieu of service of the interrogatories themselves pursuant to Rule 4:17-1(b)(ii).

DEMAND FOR DISCOVERY OF INSURANCE

Demand is hereby made upon all parties to this action pursuant to Rule 4:10-2(b) for discovery of any and all policies of insurance covering defendants for the loss complained herein on the date of accident within 30 days from the date of service hereof.

LIPARI & WALCOFF, LLC

Dated: December 28, 2020

By: 

Danielle J. Walcott, Esquire
Attorney for Plaintiff